

EXHIBIT 14

From: Danielle Nicholson <DNicholson@susmangodfrey.com>
Sent: Wednesday, September 29, 2021 6:05 PM
To: Iwahashi, Ryan K.; Huang, Aileen C.; Shawn Blackburn; Bryce T. Barcelo; Sujeeth Rajavolu; Renee Rubert; Max Tribble; Kalpana Srinivasan
Cc: *** WSOU-Cisco_GDC
Subject: WSOU v. Cisco - Follow Up to M/C

[WARNING: External Email]

Counsel,

We write regarding the three issues that Cisco asked us to provide further clarification on by today, namely—

1. ICME ('106 Patent)

- a. Cisco asked us to suggest revisions to its proposed construction for ICME or to propose an alternative construction. As noted during the meet and confer, we do not believe a construction is necessary but are willing to consider a mutually agreeable construction if it will sidestep further dispute. As an alternative to plain and ordinary meaning, we propose: “hardware and/or software which monitors one or more types of access being used.”

2. Said specific context & said context ('216 Patent)

- a. Cisco asserted that these terms are indefinite because it is purportedly unclear whether “said specific context” and “said context” refer to “first context” or “second context.” Cisco stated that if the parties can agree on whether these terms refer to the same context, we may be able to moot the issue. To that end, we believe that “said specific context” and “said context” refer to “first context.”

3. Service name of the connected services layer ('014 Patent)

- a. Cisco asked whether we could agree to construe this term to refer specifically to the “requesting connected services layer.” Upon further review, we believe that the meaning of this term is clear from the face of the patent and maintain our position that further construction is unnecessary.

Other than the alternative construction of ICME included in this email, the constructions we identified in our September 15 disclosure remain unchanged.

Thanks,
Danielle

Danielle Nicholson | Susman Godfrey LLP
1201 Third Ave. | Suite 3800 | Seattle, WA 98101
o: 206.505.3824 | c: 818.926.0804
HOUSTON • LOS ANGELES • SEATTLE • NEW YORK

From: Iwahashi, Ryan K. <RIwahashi@gibsondunn.com>

Sent: Monday, September 27, 2021 1:18 PM

To: Danielle Nicholson <DNicholson@susmangodfrey.com>; Huang, Aileen C. <AHuang@gibsondunn.com>; Shawn Blackburn <SBlackburn@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Sujeeth Rajavolu <SRajavolu@susmangodfrey.com>; Renee Rubert <RRubert@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>

Cc: *** WSOU-Cisco_GDC <WSOU-Cisco_GDC@gibsondunn.com>

Subject: RE: WSOU Cisco Disclosure of Extrinsic Evidence

EXTERNAL Email

Counsel,

As discussed on the meet and confer, here are some exemplary intrinsic cites that distinguish between explicit and implicit requests for the '859 patent:

- Col. 7:11-18
- January 23, 2007 Amendment and Applicant Remarks
- March 5, 2007 Amendment and Applicant Remarks
- August 23, 2007 Amendment and Applicant Remarks

Best,
Ryan

Ryan Iwahashi

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1881 Page Mill Road, Palo Alto, CA 94304-1211
Tel +1 650.849.5367 • Fax +1 650.849.5067
RIwahashi@gibsondunn.com • www.gibsondunn.com

From: Danielle Nicholson <DNicholson@susmangodfrey.com>

Sent: Wednesday, September 22, 2021 3:21 PM

To: Huang, Aileen C. <AHuang@gibsondunn.com>; Shawn Blackburn <SBlackburn@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Sujeeth Rajavolu <SRajavolu@susmangodfrey.com>; Renee Rubert <RRubert@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>

Cc: *** WSOU-Cisco_GDC <WSOU-Cisco_GDC@gibsondunn.com>

Subject: RE: WSOU Cisco Disclosure of Extrinsic Evidence

[WARNING: External Email]

Counsel,

Please see attached for service WSOU's Disclosure of Extrinsic Evidence. WSOU's accompanying production can be accessed at the following link.

<https://www.dropbox.com/sh/d4twax6ju1565jc/AACQYlpxvY85F54aCFh5E2loa?dl=0>

Thanks,

Danielle

Danielle Nicholson | Susman Godfrey LLP

1201 Third Ave. | Suite 3800 | Seattle, WA 98101

o: 206.505.3824 | c: 818.926.0804

HOUSTON • LOS ANGELES • SEATTLE • NEW YORK

From: Huang, Aileen C. <AHuang@gibsondunn.com>

Sent: Wednesday, September 22, 2021 2:51 PM

To: Shawn Blackburn <SBlackburn@susmangodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Sujeeth Rajavolu <SRajavolu@susmangodfrey.com>; Renee Rubert <RRubert@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Danielle Nicholson <DNicholson@susmangodfrey.com>

Cc: *** WSOU-Cisco_GDC <WSOU-Cisco_GDC@gibsondunn.com>

Subject: [WARNING: MESSAGE ENCRYPTED]WSOU Cisco Disclosure of Extrinsic Evidence

EXTERNAL Email

Counsel,

Please see attached for Cisco's Disclosure of Extrinsic Evidence along with an accompanying production.

The password to access the zip file is: **ffA@XW6sKcU5**

Best,
Aileen

Aileen Huang

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue, New York, NY 10166-0193

Tel +1 212.351.5291 • Fax +1 212.817.9390

AHuang@gibsondunn.com • www.gibsondunn.com

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.
